

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

Kansas City Regional Office
500 NE Colbern Road
Lee's Summit, MO 64086-4710
(816) 622-7000
FAX (816) 622-7044

June 25, 2001

Mr. Albert R. Slavik, Director
Security and Manufacturing
Senior Project Manager
Deffenbaugh Industries
18181 West 53rd Street
Shawnee, KS 66217

RE: Letter of Warning # 01-KC.062

Dear Mr. Slavik:

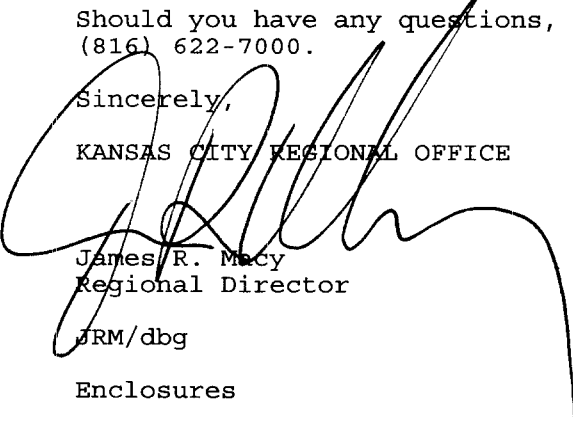
Enclosed is a copy of the Resource Conservation and Recovery Act closure evaluation inspection report for Industrial Service Corporation site located in Blue Summit, Missouri. The inspection report is based upon the closure evaluation inspection conducted on June 7, 2001.

Within 30 days from receipt of this Letter of Warning, Deffenbaugh Industries must submit a written description of all actions taken and/or a schedule for completion of all necessary actions to correct the unsatisfactory features noted in the enclosed report along with supporting documentation to our office at the letterhead address. A copy of your response must also be submitted to Ms. Kathy Flippin, Chief, Hazardous Waste Enforcement Unit, P. O. Box 176, Jefferson City, Missouri 65102.

Should you have any questions, please contact Denise Beck of my staff at (816) 622-7000.

Sincerely,

KANSAS CITY REGIONAL OFFICE


James R. Macy
Regional Director

JRM/dbg

Enclosures

c: Ms. Kathy Flippin, Hazardous Waste Program/Enforcement Section
Mr. Robert Morrison, Hazardous Waste Program/Permits Section

Jackson County
Industrial Service Corporation

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MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
CLOSURE EVALUATION INSPECTION REPORT
JUNE 25, 2001

Facility

Industrial Service Corporation
1633 South Marsh
Kansas City, MO 64126
Jackson County

EPA ID # MOD073027609
Mo. ID # 001813

Participants

Missouri Department of Natural Resources:

Ms. Denise Beck
Environmental Specialist
Kansas City Regional Office

Mr. Steven Preston
Environmental Specialist,
Kansas City Regional Office

Deffenbaugh Industries:

Mr. Albert Slavik
Director of Securing and
Manufacturing, Senior Project
Manager

Mr. Mick Cossairt
Senior Project Geologist

Introduction

A hazardous waste closure inspection was conducted at Industrial Service Corporation, located in Blue Summit, Missouri, on June 7, 2001. The purpose of the inspection was to assess the facility's compliance with the Missouri Hazardous Waste Management Law and Regulations. The scope of the inspection was confined to the facility's operations pertaining to closure of the hazardous waste storage facility. The inspection was conducted under authority granted to the department by Sections 260.375(9) and 260.377 RSMo.

Facility Description

Industrial Service Corporation (ISC) was a former used oil processing facility as well as a storage facility for hazardous waste from off-site sources. ISC formerly known as Radium Petroleum began operations at the facility in 1973, when the facility was purchased from Sam Hewett who began oil reclamation at the site in 1958. Radium Petroleum filed a timely Part A application for a hazardous waste permit and received interim status as a hazardous waste treatment/storage/disposal facility. Radium Petroleum became known as ISC in 1988.

The department approved ISC's closure plan on September 27, 1994, however ISC failed to close the facility within 180 days of approval of the plan. Partial closure activities were initiated. ISC requested several modifications to the approved closure plan and on February 22, 2000, the department approved a November 5, 1999, Closure Plan modification request. Remaining closure activities were initiated. Approximately 10,629 tons of contaminated debris was removed from the facility between May 26, 2000, through July 7, 2000, and taken to Johnson County Landfill under a special waste disposal request permit. ISC submitted a Closure Certification and Report dated April 20, 2001, which is currently being reviewed by the department's Permit Section.

On May 14, 2001, Permit Section requested Kansas City Regional Office conduct Final Closure Inspection. Upon the department's acceptance of ISC's Final Closure Certification, ISC will operate under Post-Closure.

In addition ISC entered into an Administrative Order on Consent VII-94-H-0024 for corrective action requiring Interim Measures, RCRA Facility Investigation and Corrective Measures Study. ISC has installed an interceptor trench and began operations of the collection system in October 2000. Facility personnel indicated that as of the date of the inspection, no product had been recovered from the interceptor trench. Groundwater collected by the interceptor trench is run through an oil/water separator, water discharged to the city of Kansas City sewer system.

UNSATISFACTORY FEATURES

1. Failure to maintain the effectiveness of the final cover; 10 CSR 25-7.265(1) incorporating 40 CFR 265.197(b) referencing 40 CFR 265.310. At the time of the closure inspection, the vegetative cover on the cap was sparse. The inspectors also noted evidence of erosion along the north side of the cap near the entrance gate and along the drainage path on the south portion of the cap near the building. In addition the inspectors observed an area of standing water caused by tire ruts near the south entrance gate. (See Attachment 1, photographs number 1, 2, 5, 5, 6, 7, 8, 9, 10, 11, 12, and 14 for supporting documentation.)

ISC must ensure that vegetative cover is well established and all areas of erosion and ponding are corrected.

2. Failure to maintain groundwater monitoring wells in a manner that ensure their integrity; 10 CSR 25-7.265(1) incorporating 40 CFR 265.197(b) referencing 40 CFR 265.310 referencing 40 CFR 265.91(c). At the time of the inspection, the inspectors noted that concrete pad for groundwater monitoring wells 1 and 2 were undercut. (See Attachment 1, photographs number 2 and 7 for supporting documentation.)
3. Failure to maintain site security; 10 CSR 25-7.265(1) incorporating 40 CFR 265.14(b)(2). The inspectors observed an area near the southeast portion of the site, in which the fence was torn down. In addition it was noted there was a significant gap between the building and fence near the southwest portion of the facility. The metal bars connecting the fence to the building were not sufficient to restrict access to the site. A large gap was observed between the ground surface and the fence along Marsh Street on the west side of the facility.

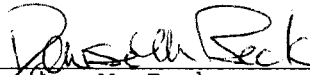
ISC must make the necessary repairs to restrict access to the site. In addition ISC should post "Danger - Unauthorized Personnel Keep Out" signs in accordance with 10 CSR 25-7.265(1) incorporating 40 CFR 265.14(c).

COMMENTS

1. Inside the building, the inspectors observed two 55-gallon drums containing according to facility personnel, debris generated from borings conducted inside the building for sampling activities in accordance with the approved closure plan. ISC must make a hazardous waste determination on the contents of the drums and properly dispose of the waste. In response to this comment, ISC should submit documentation of their hazardous waste determination and disposal records for the waste contained in the two 55-gallon drums.

2. The inspectors were unable to review disposal records for the sludge from tank 29, disposal records for tank 29, disposal records for the contents removed from UST B and UST C and the disposal records for the contaminated soil from UST C. In response to this comment, ISC should submit documentation of their hazardous waste determination and disposal records for the above-identified waste.
3. The inspectors observed water surfacing near groundwater monitoring well 4 and along the northwest corner of the cap. At the time of the inspection, facility personnel indicated they thought the water to be precipitation that had flowed along the top of the liner. ISC should ensure that the surfacing water does not affect the integrity of the cap or monitoring wells.
4. At the time of the inspection, groundwater monitoring wells 1, 2, and 4 were not labeled so as to distinguish one well from another, in addition monitoring wells 1, 2, 4, and EPA R1 were not locked. ISC should ensure that all monitoring wells on site are labeled and locked.

Reported by:

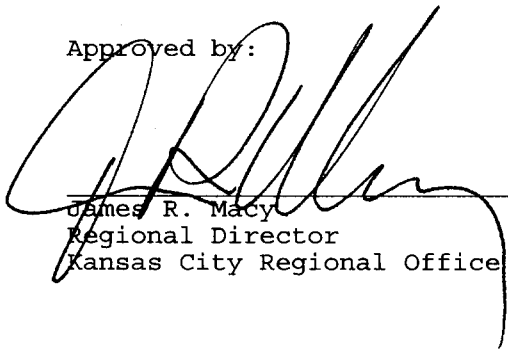

Denise M. Beck
Environmental Specialist
Kansas City Regional Office

JRM/dbg

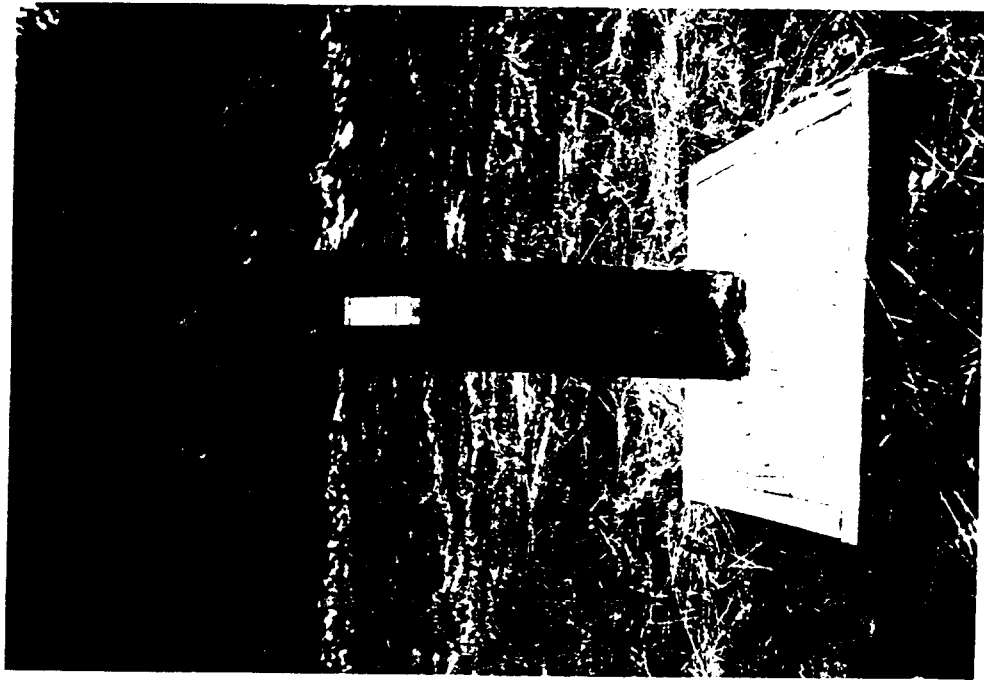
Attachment:


1. Photographs taken June 7, 2001


Approved by:

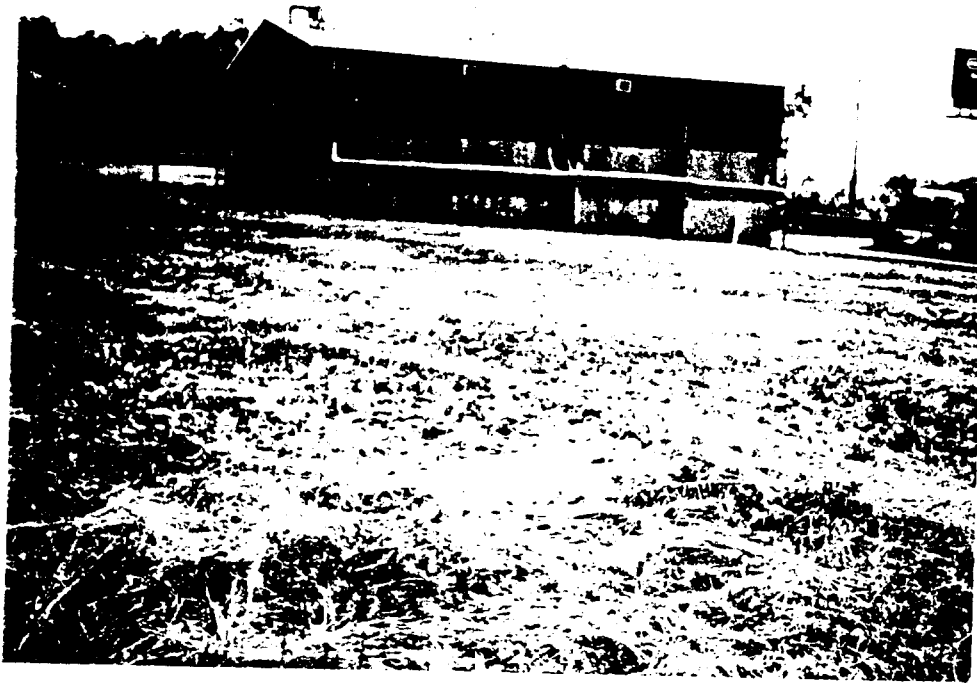

James R. Macy
Regional Director
Kansas City Regional Office

ATTACHMENT 1



Industrial Service Corporation Photo 1 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 
Water surfacing near GW-4.

Industrial Service Corporation Photo 2 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 
Monitoring well 1 not locked or marked. Slightly undercut.

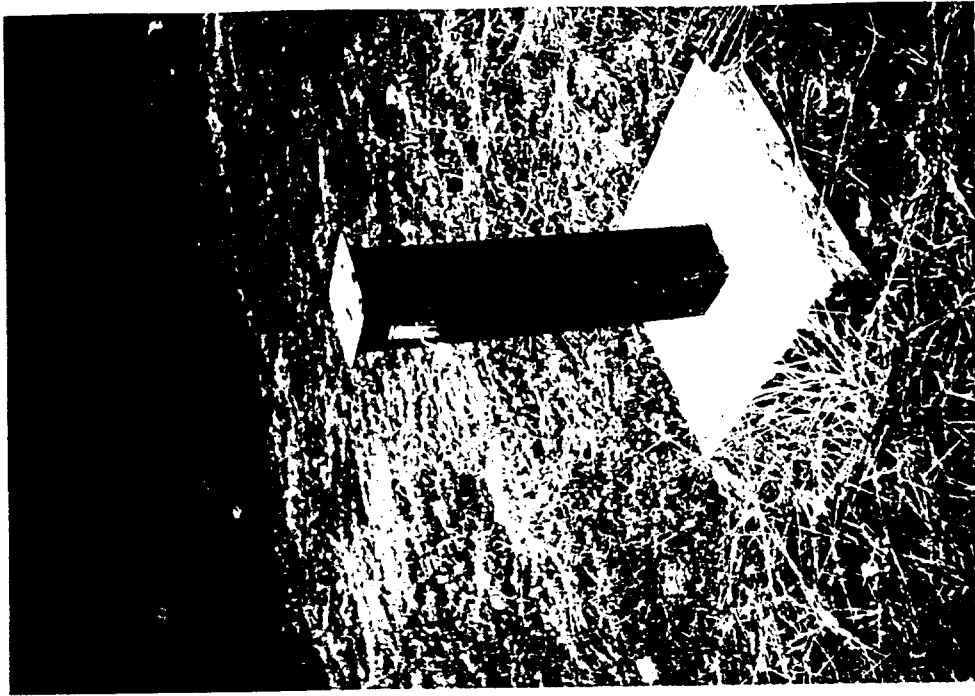



Industrial Service Corporation Photo 5 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck

Cap over former tank farm.


Industrial Service Corporation Photo 6 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck

Cap over former tank farm

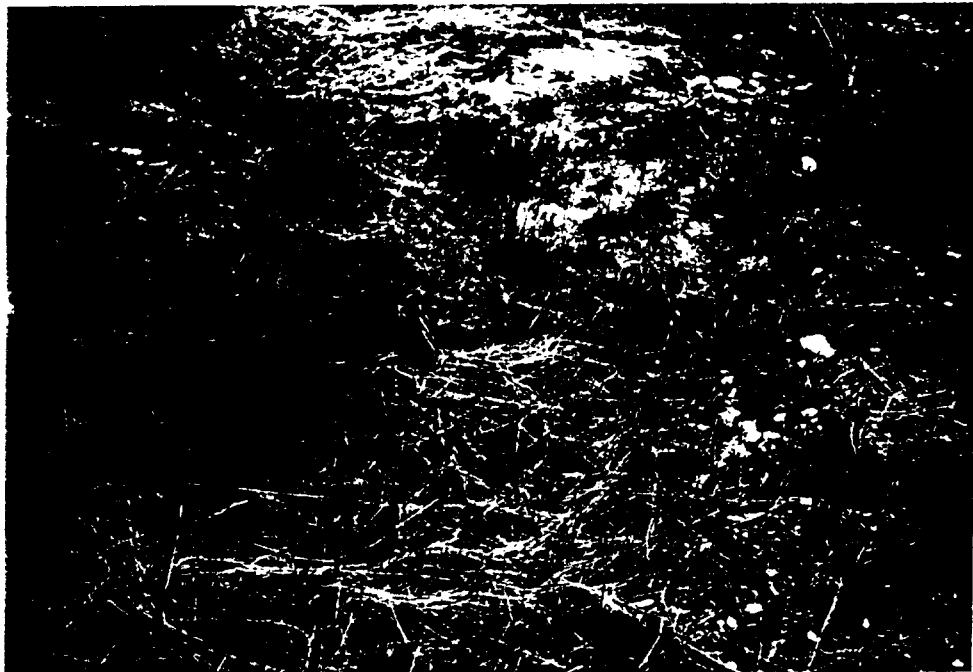



Industrial Service Corporation Photo 7 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

GW-2 not locked, marked and undercut.


Industrial Service Corporation Photo 8 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

Cap looking southeast. Note fence down near bluff area.

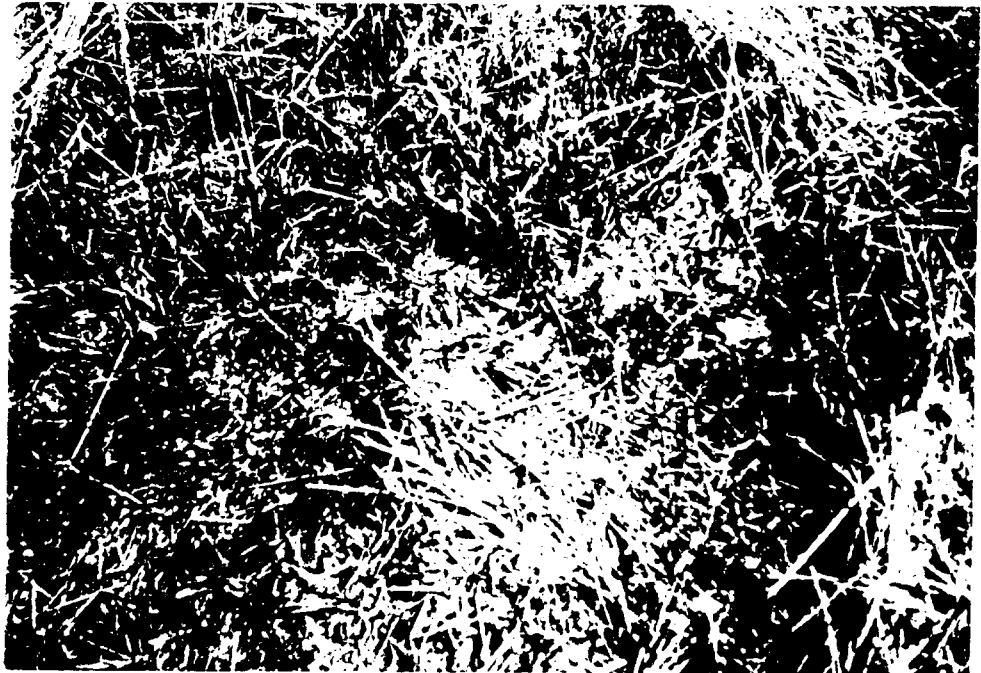



Industrial Service Corporation Photo 9 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

Erosion occurring near building.


Industrial Service Corporation Photo 10 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

Ponding occurring near south entrance gate.

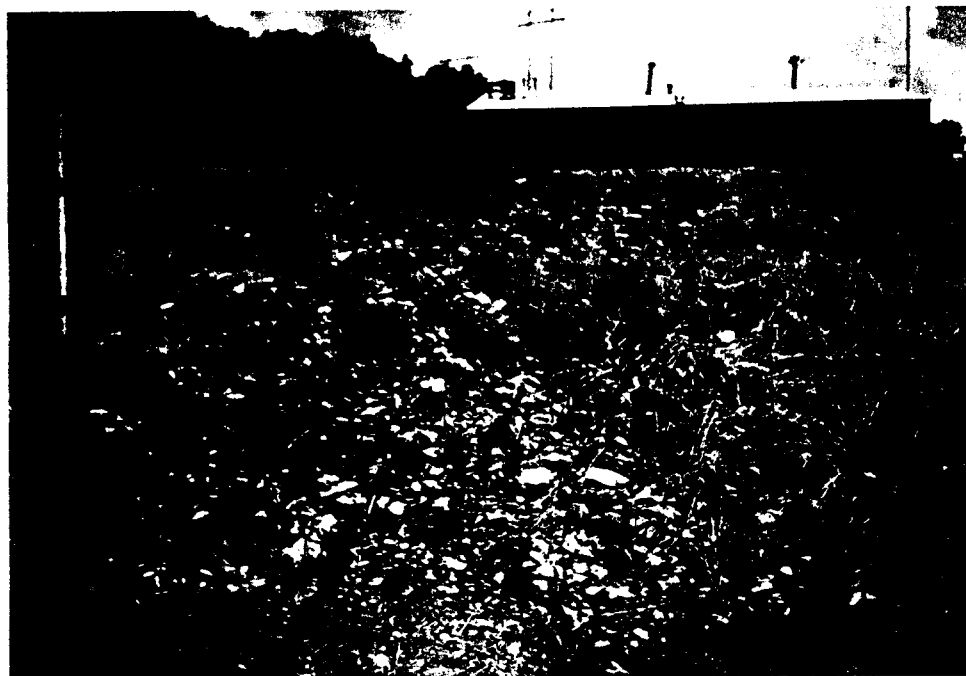
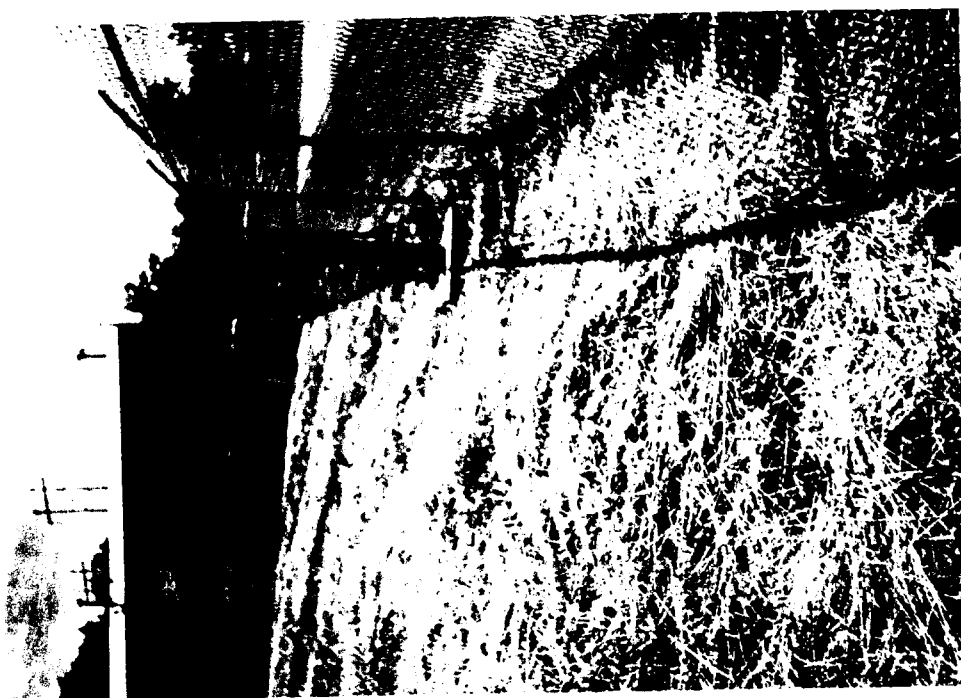


Industrial Service Corporation Photo 11 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

Northwest corner of cap. Water surfacing in that area.

Industrial Service Corporation Photo 12 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck 

Close-up of water surfacing on the northwest corner of the cap.



Industrial Service Corporation Photo 13 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck *DMB*

GW-4 not locked and marked.

Industrial Service Corporation Photo 14 of 14
Blue Summit, MO Roll 1 of 1
June 7, 2001
Photographer: Denise M. Beck *DMB*

Erosion occurring near north entrance gate.

TRANSPORTER

WHITE - ORIGINAL YELLOW - TSD FACILITY TRANSPORTER PINK - GENERATOR'S FIRST COPY

July 20, 2001

Darleen Groner, P.E.
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

Re: Closure Certification and Report for Industrial Service Corporation, Kansas City

Dear Mrs. Groner:

The following responses are provided to comments conveyed in the Missouri Department of Natural Resources (MDNR) letter dated May 16, 2001. The documentation enclosed is also provided in response to these comments and will need to be inserted into the original Closure Certification and Report binder submitted on April 20, 2001. A separate binder is also being submitted as an attachment to the original document.

Some of the documentation enclosed is also required to respond to the MDNR letter of warning (LOW # 01-KC.062). A specific response to this LOW is being submitted under separate cover. The following responses to specific comments will aid in the assembly of the completed document.

RESPONSES TO COMMENTS

Comments 1 and 2

The closure plan certification page has been modified to identify the closure plan approval letters and letters approving modifications. It has also been modified to address all tasks included in the closure plan. The certification is now signed by an independent professional engineer registered in the state of Missouri and also by the owners representative. Please remove the original certification page and replace it with the one enclosed with this correspondence.

Comment 3

Copies of the requested documentation are enclosed with this correspondence. Please remove the current contents of Section C and replace them with the new Section C enclosed.

Comment 4

Documentation of the disposition of liquids and sludge from the dismantled above ground tanks are enclosed in a new Section G. Documentation of the disposition of waste from underground storage tanks "B" and "C" (discovered during excavation activities) as well as the disposition of soil cuttings from the borings installed beneath the building are also enclosed with this correspondence as a new Section H. Please insert these new sections at the end of Section F in the original binder.

Documentation of the disposition of waste soil excavated during closure is enclosed in a separate volume as a continuation of Section H. Waste soil from the underground storage tank identified as tank "A" (also discovered during excavation) was determined to be non-hazardous as the tank was apparently closed in place. The contents of this tank were combined and disposed with the excavated soil. Documentation is therefore incorporated with these waste soil manifests .

Comment 5

The comment is acknowledged.

Comment 6

Samples submitted for dioxin analyses were collected on three different dates. All samples were shipped via Federal Express from Kansas City, Missouri to Pace Analytical Services, Minneapolis, Minnesota under Chain of Custody (COC) documentation. Sample EX-1 was collected on May 24, 2000. The sample was packed on ice in a cooler and shipped via Federal Express. The sample was received at the laboratory on May 25, 2000. There was no comment entered on the chain of custody regarding sample condition.

Twenty-one samples were collected on Friday, June 9, 2000. The first five samples collected in the morning were split with representatives of MDNR. These five samples were placed in a refrigerator formerly used at the site by Quality Analytical Services. The balance of the samples were collected in the afternoon, preserved on ice in a cooler, and shipped via Federal Express to the laboratory. These samples were received on Monday, June 12, 2000. On that date it was recognized that the original five samples had been omitted from the shipment. They were removed from the refrigerator, packed on ice in a cooler and sent to the laboratory also by Federal Express. These five samples were received on Tuesday, June 13, 2000. There were no samples received on June 22, 2000. The date recorded by the accepting party on COC 525987 is in error. The correct date was entered on COC 525988 which is the second sheet of the sixteen samples sent on June 9, 2000. All of the COC's were signed by the sampler. Although samples sent on June 9, 2000 were not signed by the party relinquishing custody, they were handled similarly to the other shipments. Custody of these samples was transferred to Mr. Rodney Mann who then shipped the samples to the laboratory via Federal Express.

Three samples were collected on July 13, 2000 to complete the excavation confirmation samples. They were packed on ice in a cooler and sent to the laboratory via Federal Express. The samples were received on July 14, 2000. A notation was made that the samples were received on ice at a temperature of 2°C.

A notation was made on the COC that the shipment sent on Friday, June 9, was received at 20°C, and the shipment sent on Monday, June 12, was received at 19°C. These temperatures convert to 68° and 66.2° on the Fahrenheit scale respectively. A search was conducted of the National Climatic Data Center for a record of high and low temperatures during June, 2000 for the airports in Kansas City and Minneapolis. The result of that data search is enclosed for your reference. The record of highs and lows for the dates in question are tabulated below for your convenience.

TABLE 1

| Location | Temperature | June 9 | June 10 | June 11 | June 12 | June 13 |
|-------------|-------------|--------|---------|---------|---------|---------|
| Kansas City | High | 88.0 | 88.0 | 79.0 | 88.0 | 86.0 |
| | Low | 63.0 | 66.9 | 71.6 | 71.1 | 66.2 |
| Minneapolis | High | 91.9 | 89.6 | 87.1 | 75.9 | 77.0 |
| | Low | 71.1 | 75.2 | 53.1 | 57.0 | 59.0 |

Soil temperature at the time of collection on June 9 was not measured or recorded, however, the samples were taken from the sidewalls and base of an excavation which had been exposed to a similar temperature range for a number of days prior to collection. It is reasonable to estimate that the soil temperature was near that of the ambient air temperature and probably in excess of the temperature recorded on receipt at the laboratory.

Representatives of Pace Analytical Services confirmed, in response to our inquiry, that dioxins are by nature inherently very stable and do not degrade readily. Indeed, the samples that were reported with the highest concentrations were those that were collected from near the original ground surface. Concentrations of samples analyzed from shipments that were within the temperature preservation specification were in the same range as those from the June 9 sampling.

In retrospect, it is unfortunate that samples were sent on a Friday and the cooler was thus subjected to three days of elevated ambient temperature in transit. However, the five samples which were inadvertently omitted from that shipment were received only 1 degree cooler in a single overnight delivery after having been refrigerated over the weekend. It is our belief, and that of Pace Analytical Services, that the temperature of the samples on receipt at the laboratory had no affect on the quality of the analytical results.

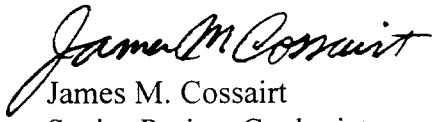
Darlene Groner, P.E.
July 20, 2001
Page 4

Comment 7

Chain of custody documents for the balance of the laboratory analysis of excavation samples and samples collected from beneath the building are enclosed. There were no discrepancies noted. These documents should be inserted at the end of the data reports included in the respective sections.

We believe the enclosures submitted with this correspondence will complete the Closure Certification and Report for this facility. Please call me at (913) 631-3300 x1207 if I may be of assistance with questions or clarification relative to content or document assembly.

Sincerely,


James M. Cossairt
Senior Project Geologist

- c. Mr. Tom Judge, MDNR
Mr. David Garrett USEPA
Ms. Denise Beck, MDNR, Kansas City Regional Office

**** NOTE:** Please do not provide to other users for commercial purposes.

Fri May 25 11:22:12 200

Maximum Temperature



- KANSAS CITY INTL (Missouri)
- MINNEAPOLIS-ST PAUL (Minnesota)

[To Download the Data File Click Here](#)

To Download the Graph (GIF file), Click Anywhere On the Graph with the Mouse

[To plot another graph click here](#)

** This dataset is not for commercial distribution **
Created on: Fri May 25 11:22:12 2001

724460, KANSAS CITY INTL , ABCDEFGHIJKL, 3919N 09443W , 0312

(A) Maximum Temperature

June 2000

-Day----Value-

| | |
|----|------|
| 01 | 89.6 |
| 02 | 90.0 |
| 03 | 78.8 |
| 04 | 82.0 |
| 05 | 82.0 |
| 06 | 75.2 |
| 07 | 82.0 |
| 08 | 87.8 |
| 09 | 88.0 |
| 10 | 88.0 |
| 11 | 79.0 |
| 12 | 88.0 |
| 13 | 86.0 |
| 14 | 87.1 |
| 15 | 84.2 |
| 16 | 84.9 |
| 17 | 75.9 |
| 18 | 73.9 |
| 19 | 75.9 |
| 20 | 82.9 |
| 21 | 80.6 |
| 22 | 84.2 |
| 23 | 89.6 |
| 24 | 89.1 |
| 25 | 87.8 |
| 26 | 90.0 |
| 27 | 79.0 |
| 28 | 79.0 |
| 29 | 80.1 |
| 30 | 80.1 |

** This dataset is not for commercial distribution **
Created on: Fri May 25 11:22:12 2001

726580, MINNEAPOLIS-ST PAUL, ABCDEFGHIJKL, 4453N 09313W , 0255

(A) Maximum Temperature

June 2000

-Day----Value-

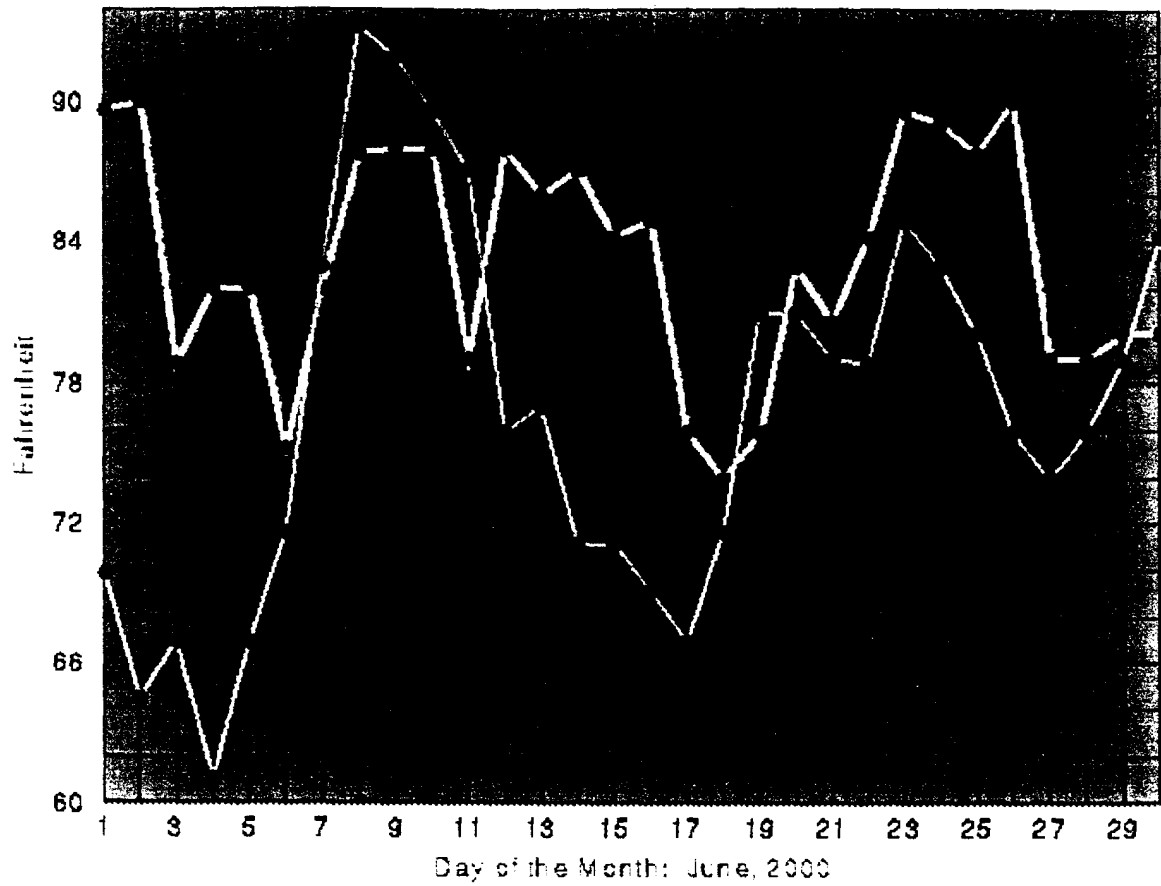
| | |
|----|------|
| 01 | 69.8 |
| 02 | 64.4 |
| 03 | 66.9 |
| 04 | 61.0 |
| 05 | 66.9 |
| 06 | 71.6 |
| 07 | 82.9 |
| 08 | 93.2 |
| 09 | 91.9 |
| 10 | 89.6 |

| | |
|----|------|
| 11 | 87.1 |
| 12 | 75.9 |
| 13 | 77.0 |
| 14 | 71.1 |
| 15 | 71.1 |
| 16 | 69.1 |
| 17 | 66.9 |
| 18 | 71.6 |
| 19 | 81.0 |
| 20 | 81.0 |
| 21 | 79.0 |
| 22 | 78.8 |
| 23 | 84.9 |
| 24 | 82.9 |
| 25 | 80.1 |
| 26 | 75.9 |
| 27 | 73.9 |
| 28 | 75.9 |
| 29 | 79.0 |
| 30 | 84.2 |

**** NOTE:** Please do not provide to other users for commercial purposes.

Fri May 25 11:22:12 200

Maximum Temperature



- KANSAS CITY INTL (Missouri)
- MINNEAPOLIS-ST PAUL (Minnesota)

[To Download the Data File Click Here!](#)

To Download the Graph (GIF file), Click Anywhere On the Graph with the Mouse

[To plot another graph click here.](#)

** This dataset is not for commercial distribution **
Created on: Fri May 25 11:25:58 2001

724460, KANSAS CITY INTL , ABCDEFGHIJKL, 3919N 09443W , 0312

(B) Minimum Temperature

June 2000

-Day----Value-

| | |
|----|------|
| 01 | 73.4 |
| 02 | 59.0 |
| 03 | 57.2 |
| 04 | 55.9 |
| 05 | 53.1 |
| 06 | 51.8 |
| 07 | 50.0 |
| 08 | 62.6 |
| 09 | 63.0 |
| 10 | 66.9 |
| 11 | 71.6 |
| 12 | 71.1 |
| 13 | 66.2 |
| 14 | 64.0 |
| 15 | 55.4 |
| 16 | 55.9 |
| 17 | 59.0 |
| 18 | 52.0 |
| 19 | 52.0 |
| 20 | 57.0 |
| 21 | 62.6 |
| 22 | 62.6 |
| 23 | 69.3 |
| 24 | 69.1 |
| 25 | 66.2 |
| 26 | 66.0 |
| 27 | 61.0 |
| 28 | 61.0 |
| 29 | 57.0 |
| 30 | 57.0 |

** This dataset is not for commercial distribution **
Created on: Fri May 25 11:25:58 2001

726530, MINNEAPOLIS-ST PAUL, ABCDEFGHIJKL, 4453N 09313W , 0255

(B) Minimum Temperature

June 2000

-Day----Value-

| | |
|----|------|
| 01 | 55.4 |
| 02 | 49.2 |
| 03 | 46.0 |
| 04 | 51.1 |
| 05 | 39.9 |
| 06 | 46.4 |
| 07 | 59.0 |
| 08 | 62.6 |
| 09 | 71.1 |
| 10 | 73.2 |

| | |
|----|------|
| 11 | 53.1 |
| 12 | 57.0 |
| 13 | 59.0 |
| 14 | 62.1 |
| 15 | 53.0 |
| 16 | 55.0 |
| 17 | 45.0 |
| 18 | 55.4 |
| 19 | 55.9 |
| 20 | 57.9 |
| 21 | 60.1 |
| 22 | 61.6 |
| 23 | 61.1 |
| 24 | 69.1 |
| 25 | 69.0 |
| 26 | 60.1 |
| 27 | 54.0 |
| 28 | 59.0 |
| 29 | 53.1 |
| 30 | 61.6 |

MICK

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

January 25, 2002

CERTIFIED MAIL – 7099 3220 0009 3885
RETURN RECEIPT REQUESTED

Mr. Al Slavik
Industrial Service Corporation
18181 W. 53rd Street
Shawnee, KS 66217

RE: Acceptance of Closure Certification for Industrial Service Corporation (ISC)
Blue Summit, Missouri, EPA ID #: MOD073027609

Dear Mr. Slavik:

In accordance with 40 CFR 265, as incorporated and modified in 10 CSR 25-7.265(1), the Missouri Department of Natural Resources hereby accepts the closure certification for the ISC facility located in Blue Summit, Missouri.

The closure certification documents were received on April 20, 2001, and July 23, 2001. The certification report was signed by Randy Alewine, P.E., Deffenbaugh Industries, on behalf of the facility, and Adam Larky, P.E., an independent registered professional engineer licensed in Missouri. The facility was inspected on June 7, 2001, by the Kansas City Regional Office and several unsatisfactory items were identified at the former storage facility. ISC remedied these unsatisfactory items and a follow-up inspection was conducted on October 17, 2001. No further unsatisfactory items were noted at that time.

In accordance with 40 CFR 265.143(h), as incorporated by 10 CSR 25-7.265(1) and modified by 10 CSR 25.265(2) of the Missouri Hazardous Waste Management Regulations, the director of the Missouri Department of Natural Resources is required to release a facility from financial assurance requirements following certification that the final closure has been completed in accordance with the approved closure plan. ISC is hereby released from financial assurance for closure and third party liability for the ISC Blue Summit, Missouri, facility. ISC shall maintain financial assurance for post-closure care as approved on July 30, 2001, and any approved modifications thereafter.

Mr. Al Slavik
January 25, 2002
Page 2

Thank you for your efforts to comply with the Missouri Hazardous Waste Law and regulations. If you have any questions regarding this matter, please contact Ms. Jacki Hicks of the department's Hazardous Waste Program at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Betty Wyse
Acting Director

BW:jhs

c: Mr. David Garrett, U.S. EPA Region VII
Adam Larky, P.E., The IT Group
Mr. George R. McGrew, Deffenbaugh Industries, Incorporated & Affiliates
Ms. Shelley Woods, Missouri Attorney General's Office
Kansas City Regional Office